

EXHIBIT 26

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

IN RE: NATIONAL)
PRESCRIPTION OPIATE)
LITIGATION,)

This document relates to:)

)MDL No. 2804

Jennifer Artz v. Endo Health)Case No. 17-md-2804
Solutions, Inc., et al.)

Case No. 1:19-OP-45459)Judge Dan Aaron
)Polster

Darren and Elena Flanagan v.)
McKesson Corporation, et al.)
Case No. 1:18-OP-45405)

)
Michelle Frost, et al., v.)
Endo Health Solutions Inc.,)
et al.)
Case No. 1:18-OP-46327)

)
Walter and Virginia Salmons,)
et al., v. McKesson)
Corporation, et al.)
Case No. 1:18-OP-45268)

)
DEPOSITION OF JACQUELINE RAMIREZ
Oxnard, California
Wednesday, February 5, 2020

Reported by:
Lori M. Barkley
CSR No. 6426
Job No. 3971225-B

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1 A. No, previous.

2 Q. Ms. Ramirez, do you know who you have sued
3 in this action?

4 A. Basically the pharmaceutical companies.
5 Basically the ones that knew and distributed the
6 meds. So I guess that would be pharmaceutical
7 companies, the distributors, I guess possibly some of
8 the pharmacists that, I guess gave the meds --

9 Q. Okay. Your understanding is that you sued
10 pharmaceutical manufacturers, distributors, and
11 pharmacists?

12 A. No, not pharmacists. Pharmacy companies.

13 Q. Pharmacy companies.

14 A. Yes.

15 Q. Can you name any of the distributors you've
16 sued in this case?

17 A. I believe there's Purdue, I believe there
18 is, I think at the call Activist, Janssen.

19 Q. Not looking at the complaint, are you aware
20 of --

21 A. Oh. So don't look --

22 Q. I'm just asking about your personal
23 knowledge if you can name the defendants that you've
24 sued in this case.

25 A. I believe one was Mallinckrodt. I believe

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1 there's Janssen, who's -- which is part of
2 Johnson & Johnson, I believe, which makes Dueagesics.

3 I believe there was -- oh, gosh. Some
4 Walgreens were in there, some Walgreen's were in
5 there, Von's.

6 And I can't remember the rest that I read.

7 Q. One more question about that.

8 Do you know what relief you are seeking in
9 this lawsuit? And do you know what I mean by that
10 when you say the relief you're seeking?

11 A. Can you explain it a little further?

12 Q. Sure.

13 What are you looking to get out of the
14 lawsuit?

15 A. Basically monitor, surveillance for the
16 children that are younger than my son. My son is 14.
17 I'm hoping -- and I hate to say the word "hoping,"
18 there's other children older than my son that's gone
19 through that, because I wouldn't want any children
20 going through this.

21 But I'm hoping so that he can be helped and
22 everything that my son's gone through, so no other
23 parents have to guess. They would have, like, some
24 kind of monitoring where they can basically learn
25 from what I have learned about the help from anybody

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1 else, I didn't get.

2 Q. You mentioned that your son is 14, but what
3 you're looking for would cover children that are
4 younger than 14?

5 A. Yes. Younger children that are being
6 born -- 'cause there are still children being born
7 with NAS. I'm -- real quick.

8 MR. DANN: Tissues.

9 THE WITNESS: There's a lot of families out
10 there that when my child was born with NAS, it wasn't
11 really, I guess acknowledged that or it wasn't --
12 maybe it was acknowledged, but it wasn't told that
13 they can be born addicted and withdrawals and the
14 developmental problems that they would go through
15 throughout their life.

16 So I did a lot of research on my own.

17 BY MS. DESH:

18 Q. You did that research, when did you do that
19 research?

20 A. After my child was born and I knew he wasn't
21 reaching his developmental skills and milestones, I
22 would search Google, go to the library, and try to
23 find anything that would correlate with what he's
24 got.

25 A lot of times, there wasn't no answers. I

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1 taking it. You guess the embarrassment. Because it
2 thinned out my hair, my hair would fall out and I
3 would get blanches and I was very skinny.

4 And I just -- I just stopped taking it -- I
5 mean, I just went off of it. Told my mom I'm not
6 taking this no more.

7 Q. So I know that you had custody until she was
8 maybe an adult of your niece; is that right, Josalyn?

9 A. Correct.

10 Q. Okay. Have any other children lived with
11 you in your home?

12 I saw a name Romero Ramirez. Is that
13 somebody that you know?

14 A. No. Probably Roman Ramirez.

15 Q. Maybe it was a misspelling.

16 So you've been married to Roman since 1998.
17 Have you been separated from Roman?

18 A. No legal separation, just you get kind of
19 like an upset kind of thing, which having a special
20 needs child can -- when you're doing a lot of
21 multiple work -- yes, I understand he works.

22 But yes, there was -- yeah, separation for
23 two weeks, a week, where it's like, okay, we're going
24 to separate, he would go to his mom's and he would
25 stay for a short period of time, like I said, a week

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1 or two, and come back.

2 So if you call that separation, I guess
3 it's -- you know.

4 Q. Did that happen on and off for several
5 years?

6 A. Yes. I think it was more so me saying, you
7 know, I'm overwhelmed, I just -- and you guess you
8 would say, I was a little younger and when you put in
9 the mix trying to raise a special needs child. And I
10 kind of felt I was doing most of the work.

11 But now that I'm older, I can kind of
12 understand why I was doing most of the work because
13 he was going to work to provide for the family and
14 especially because we needed his health insurance for
15 [REDACTED].

16 Q. Have you had health insurance continuously
17 since you were married to Roman?

18 A. Yeah.

19 Q. So you think the separation is due to your
20 feelings of being overwhelmed with your ability to
21 care for [REDACTED] and sort of the stressors in the home
22 related to that?

23 A. Yes.

24 Q. Roman was a little unclear about his work
25 schedule.